

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

**FILED**

NOV 06 2012

  
CLERK

---

UNITED STATES OF AMERICA,

CR 12-40130

Plaintiff,

INDICTMENT

vs.

Conspiracy to Defraud the United  
States; Aggravated Identity Theft

ALPHONSO RICO VALDEZ,  
a/k/a "Rico,"  
CHARLIE FRANK ADAMS,  
RAUNTA STANISLAUS ELLISON,  
JEREMY JAMAR BLOUNT,  
MELISSA DINATALY,  
TERRY DARON LIGGINS,  
CHRISTOPHER DUANE FRIERSON,  
MARQUIS BUTLER, and  
CHRISTOPHER JAMEL LUNDY,

18 U.S.C. §§ 286 and 1028A(1)(1)

Defendants.

---

The Grand Jury charges:

COUNT 1.

From on or about June 2011, until May 2012, in the District of South Dakota and elsewhere, Alphonso Rico Valdez, a/k/a "Rico," Charlie Frank Adams, Raunta Stanislaus Ellison, Jeremy Jamar Blount, Melissa Dinataly, Terry Daron Liggins, Christopher Duane Frierson, Marquis Butler, Christopher Jamel Lundy, and other persons known and unknown to the Grand Jury, knowingly and willfully entered into an agreement with each other to defraud the Department of the Treasury, a department of the United States, by obtaining and aiding to obtain the payment and allowance of false, fictitious, and fraudulent claims in the

manner and means as follows: It was part of the agreement that the Defendants and other persons known and unknown to the Grand Jury would steal the means of identification of other persons, to wit: the name, date of birth, and Social Security number, and would use that information to file fraudulent United States income tax returns which claimed false income tax refunds, in violation of 18 U.S.C. § 286.

COUNT 2.

From on or about June 2011, until May 2012, in the District of South Dakota and elsewhere, Alphonso Rico Valdez, a/k/a "Rico," Charlie Frank Adams, Raunta Stanislaus Ellison, Jeremy Jamar Blount, Melissa Dinataly, Terry Daron Liggins, Marquis Butler, Christopher Jamel Lundy, and other persons known and unknown to the Grand Jury, did knowingly transfer, possess, and use, without lawful authority, means of identification of other persons, to wit: the name, date of birth and Social Security number of other persons. The Defendants did so in relation to the commission of a felony enumerated in 18 U.S.C. § 1028A(c)(1), to wit: 18 U.S.C. § 641, all in violation of 18 U.S.C. § 1028A(a)(1).

A TRUE BILL:

\_\_\_\_\_  
[NAME REDACTED]

Foreperson

BRENDAN V. JOHNSON  
United States Attorney

By: \_\_\_\_\_  
